

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ACCELERANT SPECIALTY  
INSURANCE COMPANY,

Plaintiff

VERSUS

SERO SERVICES, LLC

Defendant

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CIVIL ACTION NO. 4:23-cv-00803

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**MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION AND/OR LACK OF VENUE  
AND/OR MOTION TO TRANSFER TO COURT OF PROPER VENUE**

MAY IT PLEASE THE COURT:

NOW INTO COURT, through undersigned counsel, comes Sero Services, LLC, who moves this Court to dismiss the instant action based on lack of personal jurisdiction over defendant and/or that this is a Court of improper venue, and/or transfer the case to a court of proper venue, all for the reasons as set forth in defendant's Memorandum in Support of the instant Motion.

Respectfully submitted,

**SCHOUEST, RAMDAS,  
SOSHRA, BENMAIER & EASTHAM**

  
RICHARD COZAD

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9 day of June, 2023, a copy of the above and foregoing pleading has been served on counsel for all parties to this proceeding via email.

  
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RICHARD A. COZAD